

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In Re: Ryan W. Montgomery and,	:	Bankruptcy Case No.: 20-21256-CMB
Amy L. Montgomery,	:	
	:	
Debtors.	:	Chapter 13
	:	
Ryan W. Montgomery and,	:	
Amy L. Montgomery,	:	
	:	Document No.: 89
Movants,	:	
	:	Related to Document No.:
v.	:	
	:	Related to Claim No.: 17
Huntington Bank,	:	
	:	
Respondent.	:	

DEBTOR'S DECLARATION OF SUFFICIENT PLAN FUNDING

Pursuant with the Notice of Mortgage Payment Change filed on September 27, 2021, after reasonable investigation and upon review of the existing Chapter 13 Plan, it appears to Debtor that the existing payment is sufficient to fund the Plan even with the proposed change for October 20, 2021.

The new post-petition monthly payment payable to Respondent is \$188.03, effective October 20, 2021, per the notice dated September 27, 2021. The Debtor's Plan payment provides for a monthly payment to Huntington Bank of \$240.00. Therefore, Debtor's Plan remains sufficient.

Respectfully Submitted,

Date: October 11, 2021

/s/Brian C. Thompson
Brian C. Thompson, Esquire
Attorney for Debtor
PA I.D. # 91197
Thompson Law Group, P.C.
125 Warrendale Bayne Road, Suite 200
(724) 799-8404 Telephone
(724) 799-8409 Facsimile
bthompson@thompsonattorney.com